

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of:	)	
	)	
Review of the Emergency Alert System	)	EB Docket No. 04-296
	)	
	)	
	)	

**COMMENTS OF VERIZON<sup>1</sup> ON  
THE EMERGENCY ALERT SYSTEM**

In its *EAS Order* and accompanying Further Notice of Proposed Rulemaking,<sup>2</sup> the Commission took an important step to improve the current Emergency Alert System (“EAS”) by extending its application to several digital communications technologies – such as digital cable systems – that did not exist when the system was created. In the FNPRM the Commission sought guidance on possible next steps that it should take in order to help develop “a robust, state-of-the-art, digitally-based public alert and warning system.” *Id.* ¶ 3. And in that regard, the Commission asked for comment on what role, if any, next-generation fiber networks – like Verizon’s fiber-to-the-premises network (FTTP) – should play in any such system. *Id.* ¶ 70. Verizon supports the extension of EAS requirements, akin to those that now apply to digital cable services, to broadcast video services provided over FTTP or other advanced broadband networks (to the extent they do not already apply). But, as explained below, the Commission should not extend additional EAS obligations to other aspects of these advanced networks. In particular, the Commission should not extend EAS to voice or data services carried over these

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<sup>1</sup> The Verizon telephone companies (“Verizon”) are the companies affiliated with Verizon Communications Inc. that are listed in Attachment A.

<sup>2</sup> *Review of Emergency Alert System*, First Report and Order and Further Notice of Proposed Rulemaking, EB Docket No. 04-296 (rel. Nov. 10, 2005) (“FNPRM”).

networks because those services do not lend themselves to providing emergency notifications on a wide scale.

1. **The Commission should apply EAS to video services provided over advanced broadband networks.** In the FNPRM, the Commission noted that several traditional telephone companies have “indicated that they plan to compete with cable television service providers and DTV broadcasters in bringing high definition content to customer’s homes through fiber optic connections,” and asked whether these providers “should . . . have public alert and warning responsibilities similar to those of the other news and entertainment providers covered in this docket.” *Id.* ¶ 70.

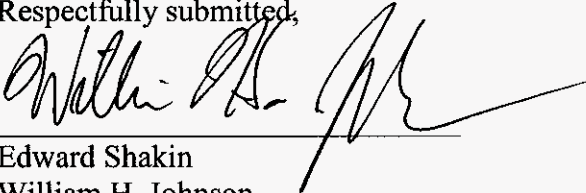
Verizon believes that the appropriate answer is yes, EAS should apply to any broadcast video services carried over FTTP and other advanced broadband networks. In fact, Verizon’s FiOS TV product – which is now available in some areas – already complies with the existing EAS obligations that apply to cable operators. Given that the video services currently offered by Verizon, and soon to be offered by other traditional telephone companies, will compete head-to-head with, and be a substitute for, the services offered by the cable incumbents, it will be important to ensure that all customers receive the benefits and protections of EAS, regardless of the technology used to deliver their video services. With that said, however, the Commission will need to be sensitive to technological differences between providers that may need to be accounted with respect to EAS, and should, consistent with public safety, adapt the EAS rules accordingly.

2. **The Commission should not extend EAS obligations to other services provided over fiber networks.** The FNPRM appropriately focuses exclusively on the broadcast video services offered by traditional telephone companies over their next-generation networks.

The EAS is designed to broadly distribute emergency notifications to a large number of people in a short period of time. Broadcast services, like television, radio, and cable, lend themselves to this purpose. The other services that will be offered over FTTP, such as Internet access services or voice services, do not. Data and voice services are point-to-point or circuit-switched services that, by their very nature, are not well situated for broadcasting emergency notifications on a wide scale.<sup>3</sup> Moreover, distributing emergency notifications over these communications services would result in using, and tying-up, vital communications channels at a time when they are needed most for emergency response. Therefore, the Commission should limit any EAS obligations to broadcast video services provided over next-generation broadband networks.

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Respectfully submitted,



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January 24, 2006

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<sup>3</sup> In our previous comments filed in this docket, we explained the many problems involving services that travel over the PSTN for purposes of EAS notifications. Comments of Verizon, *Review of the Emergency Alert System*, EB Docket No. 04-296, at 3 (filed Oct. 29, 2004).

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies participating in this filing are the local exchange carriers affiliated with the Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States  
GTE Southwest Incorporated d/b/a Verizon Southwest  
Verizon California Inc.  
Verizon Delaware Inc.  
Verizon Florida Inc.  
Verizon Maryland Inc.  
Verizon New England Inc.  
Verizon New Jersey Inc.  
Verizon New York Inc.  
Verizon North Inc.  
Verizon Northwest Inc.  
Verizon Pennsylvania Inc.  
Verizon South Inc.  
Verizon Virginia Inc.  
Verizon Washington, DC Inc.  
Verizon West Coast Inc.  
Verizon West Virginia Inc.